



Seyfarth Shaw LLP

620 Eighth Avenue
New York, New York 10018
T (212) 218-5500
F (212) 218-5526

casmith@seyfarth.com
T (212) 218-5605

www.seyfarth.com

July 24, 2025

VIA ECF

Hon. Margaret M. Garnett, U.S.D.J.
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 906
New York, NY 10007

Re: Liu v. Schulte Roth & Zabel LLP, No. 23-cv-10781-MMG (S.D.N.Y.)

Dear Judge Garnett:

We represent Defendant Schulte Roth & Zabel LLP ("Schulte") in the above-referenced action. Pursuant to Section I.B.5 of Your Honor's Individual Rules and Practices, we write jointly with Plaintiff's counsel to respectfully request an extension of the summary judgment briefing deadlines.

On June 10, 2025, the Court issued an Order setting the following schedule for summary judgment: Schulte to file its motion by July 29, 2025; Plaintiff to file her opposition by August 22, 2025; and Schulte to file its reply by September 12, 2025. See ECF No. 35.

We make this request to allow additional time for Schulte to address Plaintiff's counsel's comments on the Joint 56.1 Statement of Undisputed Facts and finalize its separate Rule 56.1 Statement of the issues which would not be included in the Joint Statement. After consulting with Plaintiff, the parties jointly propose the following revised summary judgment schedule:

- Deadline for Schulte's motion: August 12, 2025 (extended from July 29);
- Deadline for Plaintiff's opposition: September 12, 2025 (extended from August 22); and
- Deadline for Schulte's reply: October 3, 2025 (extended from September 12).

The parties have not previously requested an extension of the summary judgment schedule. This request is made in good faith and not for the purpose of causing undue delay. We thank the Court for its consideration of this request.



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Respectfully submitted,
SEYFARTH SHAW LLP

/s/ Cameron Smith

Cameron Smith

cc: All counsel of record (via ECF)

Application GRANTED. The briefing schedule on Defendant's anticipated motion for summary judgment shall be as follows: Moving papers shall be due no later than **August 12, 2025**; Plaintiff's opposition shall be due no later than **September 12, 2025**; and Defendant's reply shall be due no later than **October 3, 2025**. The Clerk of Court is respectfully directed to terminate Dkt. No. 39.

SO ORDERED. Date: 7/25/2025.

A handwritten signature in black ink, appearing to read 'Margaret M. Garnett', written over a blue circular stamp.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE